

STATEMENT OF BASIS (AI No. 27455)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0105937 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Chet Morrison Contractors, L.L.C.
Harvey Fabrication
3434 Peters Road
Harvey, Louisiana 70058

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: March 26, 2010

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. LPDES permits – LA0105937
LPDES permit effective date: July 1, 2005
LPDES permit expiration date: June 30, 2010

C. Date Application Received: December 21, 2009

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - oilfield service steel and pipe fabrication facility**

Chet Morrison Contractors, L.L.C. is an existing oilfield service steel and pipe fabrication facility. Mobile equipment such as cranes and forklifts are used and maintained at the site. The facility fabricates and refurbishes steel and pipe into small to medium structures.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II (BPJ to 0 points)
3. Wastewater Type: III
4. SIC code: 1389, 3533

C. LOCATION - 3434 Peters Road, Harvey, Jefferson Parish
Latitude 29° 51' 42", Longitude 90° 03' 57"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant with chlorination
Location: at the point of discharge from the treatment plant north of the administrative office buildings
Flow: 1,500 gpd
Discharge Route: local drainage thence to Cousins Pumping Station thence to the Harvey Canal

Outfall 002

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant with chlorination
Location: at the point of discharge from the treatment plant south of the administrative office buildings
Flow: 500 gpd
Discharge Route: local drainage thence to Cousins Pumping Station thence to the Harvey Canal

4. RECEIVING WATERS

STREAM - local drainage thence to Cousins Pumping Station thence to the Harvey Canal

BASIN AND SEGMENT - Barataria Basin, Segment 020601

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 020601, is listed on LDEQ's Final 2006 303(d) List as impaired for fecal coliform. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Barataria Basin, those suspected causes for impairment which are not directly attributed to the oilfield service steel and pipe fabrication facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Therefore, the fecal coliform impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Fecal Coliform

The fecal coliform limits on Outfalls 001 and 002 should protect against the further impairment of the receiving stream.

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6. CHANGES FROM PREVIOUS PERMIT

- The limits for Outfalls 001 and 002 have been updated in accordance with the reissuance of the Class 1 Sanitary Discharge General Permit, and the weekly average limits have been changed to daily max limits.

7. COMPLIANCE HISTORY/COMMENTS

There was an inspection at the facility on October 12, 2005 to assess damages from Hurricane Katrina. The facility had some minor roof and wall damage but was operating.

A review of DMR's was conducted for September 2007 to September 2009. DMR's were submitted in accordance with the existing permit with the exception of January –March 2008. Below is a list of excursions found.

Date	Parameter	Outfall	Reported Value	Permit Limits
7/09	Fecal Coliform	002	>6,000 col	400 col/100 mL
12/08	TSS	002	57 mg/L	45 mg/L

8. EXISTING EFFLUENT LIMITS

Outfalls 001 and 002 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	---	Report quarterly Estimate
BOD ₅	---	45 mg/L quarterly Grab
TSS	---	45 mg/L quarterly Grab
Fecal Coliform	---	400 mg/L quarterly Grab
pH	6.0-9.0 s.u. quarterly Grab	

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9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020601 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated January 5, 2010, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Chet Morrison Contractors, L.L.C.

1. **Outfalls 001 and 002** - treated sanitary wastewater (estimated flow is Outfall 001 – 1,500 gpd and Outfall 002 – 500 gpd)

	Limitation		Reference
	Monthly Avg.	Daily Max.	
Pollutant	mg/L		
Flow	Report	Report	
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: sewage treatment plant with chlorination

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the sewage treatment plants prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities, the previous permit, and the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC codes 1389 and 3533 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance,** the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

Invoice No. _____

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**LOUISIANA WATER POLLUTION CONTROL FEE SYSTEM
RATING WORKSHEET
PERMIT NO. LA0105937; AI NO. 27455; ACTIVITY NO. PER20090002
March 19, 2010**

1. Company Name: Chet Morrison Contractors, L.L.C.
Facility Name: Harvey Fabrication
2. Local Mailing Address: 3434 Peters Road
Harvey, Louisiana 70058
3. Billing Address (If different): _____
4. Facility Location: 3434 Peters Road, Harvey
Parish: Jefferson
5. Facility Type: oilfield service steel and pipe fabrication facility
Treatment Process Used: _____
6. Products Produced: _____
Raw materials stored or used: _____
By-products produced: _____
7. Primary SIC Code: 1389, 3533
Other SIC Codes: _____
8. Fac. Manager: Derick Bourg
Telephone: (504)367-4333
9. Owner: _____
Telephone: _____
10. Env. Contact: _____
Telephone: _____
11. NPDES/LPDES Permit No. LA0105937
Effective Date: July 1, 2005
Expiration Date: June 30, 2010
12. Number and ID of Outfalls: Outfalls 001 and 002 – treated sanitary wastewater
13. Number of Injection Wells: _____
14. Water Source(s): _____
15. Receiving Water(s): local drainage thence to Cousins Pumping Station thence to the Harvey Canal
16. River Basin: Barataria
Subsegment Number: 020601
17. Federal Tax ID Number: _____
18. Rater: mlb

TOTAL RATING POINTS: 0